UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Criminal Case No. CR 20-104 (NEB/TNL)

UNITED STATES OF AMERICA,)
Plaintiff,))
) SUPPLEMENTAL MOTION TO
VS.) SUPPRESS EVIDENCE SEIZED
) PURSUANT TO SEARCH
MATTHEW LEE RUPERT,	OF HOUSE
)
Defendant.)

PLEASE TAKE NOTICE that Defendant Matthew Lee Rupert, through undersigned counsel, respectfully moves the Court pursuant to Rule 12, Federal Rules of Criminal Procedure, the Fourth Amendment, and other authority, for an Order to suppress any evidence obtained from the search of his house and vehicles on or about June 1, 2020. In additions to the grounds stated in Mr. Rupert's previously filed Motion to Suppress Evidence Seized Pursuant to Search Warrants (Doc. 30) which is hereby incorporated by reference, Mr. Rupert moves to suppress on the following additional grounds:

- 1. Upon information, law enforcement agents proceeded the search prior to obtaining the warrant thereby violating Mr. Rupert's Fourth Amendment rights to be free from an unreasonable search without a warrant.
- 2. Upon information and belief, government agents arranged to cut off internet service at Mr. Rupert's home thereby preventing use of home surveillance cameras to monitor and record laws enforcement actions in violation of Mr. Rupert's Fourth

Amendment rights to be free from unlawful search and seizure obstruction of justice in violation of Fifth Amendment Due Process Rights.

This motion is based on all files, records, proceedings, and evidence to be taken at the hearing on this motion.

Dated: July 7, 2020 LAW OFFICE OF JORDAN S. KUSHNER

By s/Jordan S. Kushner

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